

# LOUISIANA RETAILERS ASSOCIATION

THE VOICE OF FREE ENTERPRISE

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June 19, 2003

Administrator – Country of Origin Labeling Program  
Agricultural Marketing Service, USDA  
Stop 0249, Room 2092-S  
1400 Independence Ave. SW  
Washington, D.C. 20250-0249

Dear Sir or Madam:

Since it's founding in 1946, the Louisiana Retailers Association has enjoyed an excellent working relationship with our grocery stores, suppliers, wholesalers, state and federal regulators including the USDA. We have studied in great detail the Federal Country of Origin Labeling law and spent many hours trying to access the potential benefits and subsequent cost of implementing such complex legislation. We are unanimous in our opinion that retailers will bare a disproportionate economic burden that only in part can be passed on to the consumer.

The law mandates Country of Origin Labeling for a wide range of products such as beef, pork, lamb, fresh and frozen seafood, and fresh and frozen fruits and vegetables. It is further mandated that the retailer must provide information on the entire life cycle of these products. For seafood, where was it caught and what country claims it as a product of that country even if caught in international waters. For beef and pork, where was it raised, slaughtered, and packaged.

Our retailers are required to give consumers information under draconian penalties up to \$10,000.00 dollars per violation. Most of the information that retailers are required to give is out of their control-retailers must trust the system and suppliers as to the veracity of claims made about the product.

The labor-intensive record-keeping requirements will place undue financial pressure on an industry that is already struggling to achieve a 1% to 2% profit margin. Retailers that are boarder lined now will try to pass a portion of these accelerated cost to their customers but competition will exacerbate the further shift of the local grocer to giant discounters.

In the final analysis, a Louisiana grocer is placed in the untenable position of complying and being competitively challenged into failure or not complying and losing their business through excessive penalties and legal fees.

We ask you to consider these insurmountable burdens, foisted on the retail industry at a time that the USDAS' current program to inspect meats and produce assures food safety. If further inspections are necessary retailers will work diligently to cooperate however we feel that the creation of a new multi-billion dollar program is not in the best interest for retailers or consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "William S. Schultz".

William S. Schultz  
President  
Louisiana Retailers Association